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May 1, 2025

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 14A
New York, NY 10007-1312

Re: *Leadenhall Capital Partners LLP et al v. Wander et al*, 24-cv-03453-JGK

Dear Judge Koeltl:

I write on behalf of Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investments Fund PLC (together, “Leadenhall”) in accordance with Your Honor’s Individual Practices § VII.A.2 to respectfully request approval to file with redactions and/or under seal materials filed in Leadenhall’s Motion for Contempt Against the Guarantors, A-CAP, and Kenneth King.¹ The information that Leadenhall seeks to file with redactions and/or under seal is information that Defendants have indicated is competitively sensitive or that the Court has already determined should remain sealed on the public docket.

The accompanying Memorandum of Law and Declaration of Leigh M. Nathanson (“Nathanson Declaration”), inclusive of exhibits, contain information relating to: (i) the transfer of Trans Atlantic Lifetime Mortgages Limited (“TAMI”); (ii) debt provided by a subsidiary of the Guarantors to Everton Football Club; (iii) the transcript of the deposition of Josh Wander in the action *777 Partners LLC and SuttonPark Capital LLC vs. Leadenhall Capital Partners et al.*, Case No. 24-cv-81143 (S.D. Fla.) (“Florida Action”); and (iv) the transcript of the deposition of Steven Pasko in the Florida Action. The 777 Entity Defendants have indicated that information in category (i), concerning the economic terms of the proposed TAMI transaction set forth in Exhibit A to the Nathanson Declaration, is competitively sensitive. *See* Nathanson Declaration, Exhibit A. A-CAP has indicated that information in category (ii), concerning the economic terms of the Everton transaction set forth in A-CAP’s October 18, 2024 letter to the Court, is competitively sensitive. ECF Nos. 218-220. Finally, concerning categories (iii) and (iv), Wander and Pasko have designated the transcripts of their depositions taken in the Florida Action as confidential and indicated that these materials should be filed under seal. *See* ECF No. 273.

¹ Capitalized terms have the same meaning as set forth in Leadenhall’s accompanying Memorandum of Law.

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Pursuant to the Court's Individual Practices, concerning category (i), Leadenhall has notified Defendants that, within three days, they must file a letter explaining the need to seal or redact this information. In prior rulings on the parties' sealing requests, this Court has already determined that the information set forth in categories (ii)-(iv) may be filed under seal. ECF Nos. 222, 276.

Leadenhall has filed electronically through the court's ECF system in conformity with the court's standing order, 19-mc-00583, and ECF Rules & Instructions, section 6.

Respectfully submitted,

/s/ Leigh M. Nathanson
Leigh M. Nathanson